iowa department of environmental quality

reply to: Steve Hoambrecker
phone: 319/653-2135

September 27, 1982

Roger Burtraw, Division General Manager
Sheller-Globe
3200 Main Street
Keokuk, IA 52632

Re: RCRA Hazardous Waste Inspection

Dear Mr. Burtraw:

Enclosed is a hazardous waste inspection report of your facility. We believe that you will find the report self-explanatory and concur with report recommendations.

Mr. Whiting has made numerous recommendations, many of which should be corrected by the time you receive this report. A follow-up inspection will be conducted in the near future to check on your facility's compliance.

You are also advised that this report is being forwarded to our Hazardous Waste Section and is subject to additional comment.

Should you have any questions or would like to discuss this report further, feel free to contact our office.

Sincerely,

COMPLIANCE DIVISION

for Earl C. Voelker, Sr.
Regional Administrator
Regional Office No. 6

ECV:SH:w

Enc.
xc: E. Evans, H.W., DEQ, Des Moines
P. Culver, EPA, Region #7, Kansas City, MO

IOWA DEPARTMENT OF ENVIRONMENTAL QUALITY
Report Of Investigation

INVESTIGATION DATE

Current 9/9/82 | Last None

TO: (Facility Name, Location & Address)

Sheller - Globe
3200 Main St.
Keokuk, IA 52632

RE: (Specify Investigation Purpose Or Cite Rule)

HAZARDOUS WASTE INSPECTION
IAD005136023

FROM: (Use Stamp)

Region No. 6
P. O. Box 27
Washington, Iowa 52353

Persons Contacted (Name & Position)

Michael E. Stone, Plnt. Eng. Supervisor

Gregory D. Sautter, P.E., Mgr. of Environmental Activities

OBSERVATIONS/RECOMMENDATIONS

Sheller - Globe manufactures weather strip and crash pads (dash boards) for use in automobile manufacture. This facility has about 27,000 sq. ft. of floor space that is protected throughout by an overhead sprinkler system. The plant is about one-half masonry construction and one-half structural steel/metal panel construction.

The unit operations in weather strip production are:

1) batching rubber (banbury mixing),

2) forming by extrusion (some dual-durometer),

3) curing,

4) cutting,

5) applying mastik to some stripping -- a synthetic resin, non-drying, flash point 400° F. Mr. Stone said a material safety data sheet has been submitted with a special waste authorization application for disposal of mastik in an Iowa landfill.

6) punching of some strip to accomodate metal clip attachment.

The unit processes in crash pad production are:

1) injection molding of plastic insert,

2) painting - 35% are painted prior to forming, 10 different colors are used,

3) vacuum forming of ABS skin,

4) polyurethane foam is applied between the skin and insert,

SUSPENSE DATE	Signature	Date
	Inspector: David N. Whiting — David N. Whiting	9/17/82
1 1	Regional Administrator: Earl C. Voelker, Sr. — by Steve Hoogendoorn	9-28-82

Enclosures (Specify)

Distribution: Regional Office: Central Office: Inspected Facility

RP-5 (8-79)

IOWA DEPARTMENT OF ENVIRONMENTAL QUALITY

SANITARY LANDFILL INSPECTION ☐

WATER SUPPLY INSPECTION ☐

WASTEWATER TREATMENT FACILITY INSPECTION ☐

AIR QUALITY INSPECTION ☐

HAZARDOUS WASTE INSPECTION [x]

Facility/Permit #

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ITEM CODE	COMMENTS AND RECOMMENDATIONS

5) trimming/finishing,

6) washing - soap and water,

7) minor labeling and assembly.

The hazardous wastes generated are predominantly from the crash pad manufacture. The cure line (where foam is applied between the skin and the insert) has injection heads that must be flushed with solvent. The heads inject the resin and iso sides of the foam. They are flushed with methylene chloride, E.P.A. no. F002. Nearly 100% of the spent methylene chloride generated is from head flush. About 70% of the F002 listed on this facility's Part A Application (pg. 3 of 5) is methylene chloride. Small amounts of methyl ethyle ketone, isopropyl and butyl alcohols, toluene diisocyanate, and resin containing freon are generated, predominantly from the head flush operation.

The painting operation generates paint sludge from water wash booth clean-up and spent thinner from paint line clean-up. The paint sludge has been accumulating on-site for about two years. The sludge will have to be tested for characteristics of hazardous waste as specified in 40 CFR Part 261 Subpart C.*

The spent thinners from painting are toluene, methyl isobutyl ketone, xylene, and acetone. Toluene and MIBK, E.P.A. no. F005, are more in use now at this facility as thinners, where as xylene and acetone, E.P.A. no. F003, were the thinners most used in the past.

Mr. Stone has indicated that McKesson Chemical Co. reclaims the facility's spent solvents at New Castle, KY. This transporter takes all solvents in the same tank truck unless the viscosity of the spent material is such that the transporter will refuse to pump from those drums. Mr. Stone said this is the manner in which methylene chloride contaminated material will be generated.

The major problem now existing at this facility stems from the fact that paint sludge, mastik, head flush and other wastes have accumulated on site for about two years. There are currently about 1,000 full drums of wastes in storage. Mr. Sautter estimates that only 200 - 250 of these drums contain hazardous wastes. The problem this facility is faced with is sorting

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AIR QUALITY INSPECTION ☐

HAZARDOUS WASTE INSPECTION [x]

Facility/Permit #

IAD | 0 | 0 | 5 | 1 | 3 | 6 | 0 | 2 | 3 |

ITEM CODE	COMMENTS AND RECOMMENDATIONS
	out these containers, hazardous from non-hazardous and at the same time applying to dispose of some of this material in an Iowa landfill. This facility has interim status as a storage facility of hazardous waste. *40 CFR references refer to Federal hazardous waste rules as promulgated on May 1, 1980 and as adopted by the State of Iowa (400 I.A.C. 45) on January 20, 1981.

Company Name Sheller-Globe [redacted] Date of Inspection 9/9/82 [redacted] IAD 0 0 5 1 3 6 0 2 3

HAZARDOUS WASTE MANAGEMENT FACILITY General Administrative Requirements Site Inspection Report Checklist	Instruction Answer and Explain as Necessary

1. Waste Analysis [40 CFR 265.13 as incorporated in 400--45 (455B) I.A.C.]
   a. Waste Analysis Plan: [ ] Adequate [x] More Effort Required
   & b. Waste Analysis Results (operating record): [ ] Adequate [x] Inadequate

2. Security (264.14) [If applicable]
   a. Access Control: [x] Adequate [ ] More Effort Required
   & b. Warning Signs: [ ] Inadequate [ ] Not Applicable

3. Inspection (265.15)
   a. Inspection Schedule: [ ] Adequate [ ] More Effort Required
   & b. Inspection Log (operating record): [x] Inadequate

4. Personnel Training (265.16)
   a. Position Descriptions: [ ] Adequate [ ] More Effort Required
   & b. Training Records: [x] Inadequate

5. Preparedness and Prevention Procedures (265.30 & 265.31)
   a. Required Equipment (265.32): [x] Adequate [ ] More Effort Required
   & b. Testing and Maintenance of Equipment (265.33): [ ] Inadequate [ ] Not Applicable
   c. Access to Communications or Alarm Systems (265.34): [x] Adequate [ ] More Effort Required
   & d. Required Aisle Space (265.35): [ ] Inadequate [ ] Not Applicable
   e. Arrangements with Local Authorities (265.37): [x] Adequate [ ] More Effort Required [ ] Inadequate [ ] Not Applicable

6. Emergency Procedures (265.56)
   a. Contingency Plan (265.52): [ ] Adequate [x] More Effort Required
   & b. Instruction on Contingency Plan (training records): [ ] Inadequate
   c. Summary and Details of Implementation of Contingency Plan: [ ] Adequate [ ] More Effort Required [ ] Inadequate [x] Not Applicable

7. Waste Accountability
   a. Manifests - HW Received & Shipped (265.71 & 262.23): [x] Adequate [ ] More Effort Required [ ] Inadequate [ ] Not Applicable
   b. Description & Location of HW within Facility (operating record) (265.73): [ ] Adequate [ ] More Effort Required [x] Inadequate [ ] Not Applicable

8. Closure
   a. Closure Plan (265.112): [x] Adequate [ ] More Effort Required
   & b. Closure Cost Estimate (265.142): [ ] Inadequate
   c. Financial Assurance for Facility Closure (265.143 - by 4/13/82): [ ] Adeauate [ ] More Effort Required [ ] Inadequate

9. Post-Closure (Disposal Facility)
   a. Post-Closure Plan (265.118): [ ] Adequate [ ] More Effort Required
   & b. Post-Closure Cost Estimate (265.144): [ ] Inadequate
   c. Financial Assurance for Post-Closure Monitoring & Maintenance (265.145 - by 4/13/82): [ ] Adequate [ ] More Effort Required [ ] Inadequate

10. Liability Insurance (265.147 - by 4/13/82): [ ] Adequate [ ] More Effort Required [ ] Inadequate

Company Name Sheller-Globe Date of Inspection 9/9/82 IAD 00513602 3

STORAGE FACILITIES SITE INSPECTION REPORT CHECKLIST 11 (Containers)	Instruction Answer and Explain as Necessary
a. Condition of Container (265.171) [ ] Adequate [ ] More Effort Required & b. Management of Containers (265.173) [x] Inadequate	
c. Inspections (265.174) [ ] Adequate [x] More Effort Required [ ] Inadequate	
d. Special Requirements for Ignitable Waste(265.176) [x] Adequate [ ] More Effort Required & e. Special Requirements for Incompatible Waste(265.177) [ ] Inadequate [ ] Not Applicable	
f. Security [ ] Adequate [x] More Effort Required & g. Required Emergency Response Equipment [ ] Inadequate [ ] Not Applicable	
h. Containment (264.175) [ ] Adequate [ ] More Effort Required [ ] Inadequate N/A	
i. Estimated Type and Number of Containers: est. 1,000 drums — est. 75% - 80% non hazardous	
j. Labeling/Marking on Containers (262.31, 32, 34) [ ] Adequate [ ] More Effort Required [x] Inadequate	

STORAGE AND/OR TREATMENT FACILITIES SITE INSPECTION REPORT CHECKLIST 12 (Tanks)	Instruction Answer and Explain as Necessary
a. Condition of Tanks (265.192) [ ] Adequate [ ] More Effort Required [ ] Inadequate	
b. Uncovered Tank Requirements (265.192) [ ] Adequate [ ] More Effort Required & c. Tank with Continuous Feed Requirement (265.192) [ ] Inadequate [ ] Not Applicable	
d. Inspection (265.194) [ ] Adequate [ ] More Effort Required [ ] Inadequate	
e. Special Requirement for Ignitable or Reactive Wastes (265.198) [ ] Adequate [ ] More Effort Required [ ] Inadequate [ ] Not Applicable	
f. Security [ ] Adequate [ ] More Effort Required & g. Required Equipment [ ] Inadequate [ ] Not Applicable	

IOWA DEPARTMENT OF ENVIRONMENTAL QUALITY

SANITARY LANDFILL INSPECTION ☐

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AIR QUALITY INSPECTION ☐

HAZARDOUS WASTE INSPECTION [x]

Facility/Permit #

IAD 0 0 5 1 3 6 0 2 3

ITEM CODE	COMMENTS AND RECOMMENDATIONS
1.a., b.	Waste Analysis, Plan and Operating Record This facility has developed a waste analysis plan as required by 40 CFR Sec. 265.13, but the plan should be more specific as to: 1) the rationale for selection of the parameters being analyzed, 2) the method of sampling (collection method) to assure a representative sample, 3) the frequency with which the analysis will be repeated to ensure that it is accurate and up to date. An operating record to monitor and log sample collection method and frequency to comply with provisions of the waste analysis plan must be developed.
2.b.	Security, Warning Signs This facility has warning signs with an appropriate legend, but needs to get them installed in places near their storage of hazardous waste as required by 40 CFR Sec. 265.14. The signs should be located in areas prominent to anyone entering the storage area from any direction.
3.a., b.	Inspection Schedule and Log Inspections of fire protection equipment are conducted at this facility, but an inspection schedule and log in compliance with 40 CFR Sec. 265.15 has not been prepared. In general, the facility must be inspected for malfunctions, deteriorations or operating errors which may lead to a release of hazardous waste to the environment or pose a threat to human health. Inspections should be conducted frequently enough to detect minor problems before they become major ones. A written inspection schedule should be developed to ensure that all equipment for operating, monitoring, safety, emergencies and security devices are properly functioning. The inspection log should include the date and time of inspection, item inspected, the name of the inspector, the notation of observations made and the date and nature of any repairs or other corrective action.

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IAD 0 0 5 1 3 6 0 2 3

ITEM CODE	COMMENTS AND RECOMMENDATIONS
4.a., b.	Personnel Training, Position Descriptions and Training Records This facility has not developed a personnel training program as required by 40 CFR Sec. 265.16. The general objective of the program should be to teach employees to perform their duties in a way that will ensure the facility's compliance with applicable hazardous waste rules and regulations and in a way that teaches employees to handle wastes safely. The training program should include: 1) direction by a person trained in hazardous waste management procedures, 2) successful completion by personnel of a program of classroom or on-the-job training relevant to the positions in which they are employed, 3) instruction in emergency procedures, 4) annual review of initial training, 5) job titles and descriptions of positions related to hazardous waste and the name of the employee filling each position, 6) a written description of initial and subsequent training given to the employees in positions of (5) above.
6.a., b.	Emergency Procedures, Contingency Plan and Instruction on the Contingency Plan. This facility has developed a contingency plan as required by 40 CFR Sec. 265.50-52 but has not sent copies to local authorities as required by 40 CFR Sec. 265.53. This facility also needs to give instruction to employees, relevant to their positions, on the contingency plan and enter the instruction into the employees training record as required by 40 CFR Sec. 265.16 (a) (2).
7.b.	Waste Accountability, Operating Record This facility has not developed an Operating Record as required by 40 CFR Sec. 265.73. The operating record is an in-house tracking system where a storage facility follows containers of waste from generation to manifested shipment off-site.

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HAZARDOUS WASTE INSPECTION [x]

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ITEM CODE	COMMENTS AND RECOMMENDATIONS
11.a., b.	Storage facilities Site, Condition of Containers and Management of Containers Some containers were leaking, some appeared structurally weakened, and at least one container was severely bulging. There is a possibility that the containers in bad shape or leaking do not contain hazardous waste, but they are in the hazardous waste storage area and the containers of hazardous wastes are not segregated from the containers of non hazardous waste. The contents of 'leakers', 'bulgers' and containers not in good condition must be transferred to structurally sound and tight containers if the 'poor' containers have hazardous waste in them. This is required by 40 CFR Sec. 265.171. Containers that have open tops or bungs missing must be closed as required by 40 CFR 265.173. Again, many of the containers with open tops do not have hazardous waste in them, but this will not be definitely known until all the waste is separated into hazardous and non-hazardous categories.
11.c.	Inspections This facility has developed an inspection schedule and log to comply with 40 CFR Sec. 265.174 but has not implemented the program.
11.f.	Security The gate to the "backyard" of this facility must not be left open and unattended as this is a violation of 40 CFR Sec. 265.14. More warning signs should be installed around the hazardous waste storage area.
11.g.	Required Emergency Response Equipment It would be a good idea to store some spill clean up equipment in the small building located near the hazardous waste storage area.
11.j.	Labeling/Marking on Containers The containers of waste must be indelibly marked or coded in some manner that reflects the containers contents. This will help avoid the current problem that has developed in the storage, i.e. segregating hazardous from non-hazardous waste.

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HAZARDOUS WASTE INSPECTION [x]

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ITEM CODE	COMMENTS AND RECOMMENDATIONS

SUMMARY OF RECOMMENDATIONS

1) Identify wastes currently in storage and segregate hazardous from non-hazardous.

2) Transfer contents of any drums leaking hazardous waste to good drums and close the tops of any open drums of hazardous waste.

3) Collect representative samples of the paint sludge and have them analyzed for characteristics of hazardous waste as specified in 40 CFR Part 261 Subpart C.

4) Do not leave the gate at the rear of the facility (near the waste storage area) open and unattended.

5) Give instruction on the contingency plan to employees.

6) Give copies of the contingency plan to local emergency response organizations as specified in 40 CFR Sec. 265.53.

7) Implement the storage site inspection program.

8) Install more hazardous waste warning signs in prominent locations around the hazardous waste storage area.

9) Develop an operating record to track hazardous waste movement 'in-house'.

10) Begin to label or identify in some manner hazardous waste containers when generated.

11) Put some spill clean up equipment near the hazardous waste storage area.

12) Develop a personnel training program as outlined under item code 4.

13) Develop an inspection schedule and log as outlined under item code 3.

14) Develop a log for waste analysis results as outlined under item code 1.

15) Make changes in the waste analysis plan to address the suggestions specified under item code 1.